

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, Indiana 46360**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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| Operation Permit No.: T091-7666-00079 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: |

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary polystyrene shape molding operations.

Responsible Official: Morton Rosen
Source Address: 955 Woodland Avenue, Michigan City, Indiana 46360
Mailing Address: 955 Woodland Avenue, Michigan City, Indiana 46360
SIC Code: 3086
County Location: LaPorte
County Status: Nonattainment for sulfur dioxide
Source Status: Part 70 Permit Program
Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- 1) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1
- 2) Twenty-four (24) foam polystyrene storage silos with a total maximum storage capacity of 60,000 pounds.
- 3) One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.
- 4) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.
- 5) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.
- 6) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.
- 7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.
- 8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.
- 9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

- 10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.
- 11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.
- 12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.
- 13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.
- 14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.
- 15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.
- 16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.
- 17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.
- 18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.
- 19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.
- 20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.
- 21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.
- 22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.
- 23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- 1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

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| (a) | All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM. |
| (b) | Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act. |

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination

becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:
- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
 - (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions of the 10.5 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu, which was determined by the following equation:

$$P_t = 1.09/Q^{0.26}$$

Pt = Pounds of particulate matter emitted per million Btu heat input

Q = Total source maximum operating a capacity rating in million Btu per hour heat input.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Monitoring

The boiler shall combust only natural gas..

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements [40 CFR part 60.48c]

Pursuant to 40 CFR part 60.48c, records shall be maintained of the amounts of natural gas combusted during each day by the 10.5 MMBtu/hr boiler. These records shall be kept for at least the past 24 month period.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Twenty-four (24) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 60,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

BACT - The OAM, IDEM has determined the BACT for the pre expander, rated at 500 pounds per hour and # 2 pre expander, rated at 1500 pounds per hour shall be as follows:

1. The molding compound shall contain a maximum average of 5.5% pentane.
2. Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.
3. The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
 - (1) The amount and VOC content of expandable polystyrene molding compound. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records of the average monthly pentane content which shall be less than 5.5%.

D.2.6 Reporting Requirements

- a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- b) To document compliance with Condition D.2.2 and D.2.3 the Permittee shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous years search, and schedule of switching material with lower pentane and VOC content if the material is available.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activity:

- 1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions of the 8.4 MMBtu per hour boiler shall be limited to 0.5 pounds per MMBtu, which was determined by the following equation:

$$Pt = 1.09/Q^{0.26}$$

Pt = Pounds of particulate matter emitted per million But heat input

Q = Total source maximum operating a capacity rating in million But per hour heat input.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Monitoring

The boiler shall combust only natural gas.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Polyfoam Packers Corporation
Source Address: 955 Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-7666-00079

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Polyfoam Packers Corporation
Source Address: 955 Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-7666-00079

This form consists of 2 pages

Page 1 of 2

| | |
|----------------------------|--|
| Check either No. 1 or No.2 | |
| 9 | 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 | 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days |

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation: |
| Describe the cause of the Emergency/Deviation: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Polyfoam Packers Corporation
Source Address: 955 Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-7666-00079
Facility: Expanding, Storing and Molding of Expandable Polystyrene
Parameter: VOC
Limit: 20.75 tons/month

YEAR: _____

| Month | Polystyrene Usage (tons/month) | VOC Content Pentane (%) | VOC* Emissions (Tons/month) | Usage limit tons/month |
|---------|-----------------------------------|----------------------------|-----------------------------------|---------------------------|
| Month 1 | | | | 26.77 |
| Month 2 | | | | 26.77 |
| Month 3 | | | | 26.77 |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

* VOC Emissions (tons/month) = Polystyrene Usage (tons/month) * VOC% (1-22.5%)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Polyfoam Packers Corporation
Source Address: 955 Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-7666-00079

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| Compliance Monitoring Requirement (e.g. Permit Condition D.1.3) | Number of Deviations | Date of each Deviations |
|---|-----------------------------|--------------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)**

Source Background and Description

Source Name: Polyfoam Packers Corporation
Source Location: 955 Woodland Avenue, Michigan City, IN 46360
County: LaPorte
SIC Code: 3086
Operation Permit No.: T091-7666-00079
Permit Reviewer: Peggy Zukas

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Polyfoam Packers Corporation relating to the operation of expandable polystyrene molding compound into shape molded products.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) boiler, model number CB 700-250, fueled by natural gas only, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1.
- (2) Twelve (12) Foam polystyrene storage silos with a total maximum storage capacity of 60,000 pounds.
- (3) One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.
- (4) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.
- (5) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.
- (6) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.
- (7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.
- (8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.
- (9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.
- (10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The application includes information relating to the construction and operation of the following unpermitted pre-expanders and molding presses.

- (1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.
- (2) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.
- (3) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.
- (4) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.
- (5) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.
- (6) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.
- (7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.
- (8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.
- (9) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.
- (10) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.
- (11) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.
- (12) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.
- (13) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.
- (14) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (Boiler model number CB 700-200, rated at 8.4 MMBtu per hour). This is the same boiler already listed under the unpermitted (item 1) of this TSD.
- (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Combustion source flame safety purging on startup.
- (4) Closed loop heating and cooling systems.
- (5) Natural draft cooling towers not regulated under a NESHAP.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Enclosed system for conveying plastic raw materials and plastic finished goods.
- (8) Lowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (9) Stationary fire pumps.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 091-4823, issued on March 29, 1996.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed operated prior to receipt of the proper permit:
 - (1) One (1) boiler, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.
 - (2) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.
 - (3) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.
 - (4) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.
 - (5) One (1) molding press, rated at 300 pounds per hour, exhausting to stack S-9
 - (6) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.
 - (7) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.
 - (8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

- (9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.
 - (10) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.
 - (11) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.
 - (12) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.
 - (13) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.
 - (14) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.
 - (15) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. A notice of completeness letter was mailed to the source on January 17, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 pages in Appendix A).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

| Pollutant | Potential Emissions (tons/year) |
|-----------------|---------------------------------|
| PM | less than 100 |
| PM-10 | less than 100 |
| SO ₂ | less than 100 |
| VOC | greater 100 less than 250 |
| CO | less than 100 |
| NO _x | less than 100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions submitted by the applicant.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | -- |
| PM-10 | -- |
| SO ₂ | -- |
| VOC | 96.4 |
| CO | -- |
| NO _x | -- |

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

| Process/ facility | Limited Potential to Emit (tons/year) | | | | | | |
|--------------------------|--|-------|-----------------|------------------|----|-----------------|------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Boiler 10.5 MMBtu/hr | 0.6 lbs/MMBtu | | | | | | |
| Boiler 8.4 MMBtu/hr | 0.5 lbs/MMBtu | | | | | | |
| Molding process lines | | | | 20.75 tons/month | | | |

County Attainment Status

The source is located in LaPorte County.

| Pollutant | Status |
|-----------------|------------|
| TSP | attainment |
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The 10.5 MMBtu/hr natural gas fired boiler is subject to the New Source Performance Standard (NSPS), 326 IAC 12 (40 CFR Part 60.40c, Subpart Dc) because the boiler was constructed after the applicable date of June 9, 1989 and the maximum heat input capacity is greater than the applicable maximum heat input capacity of 10 MMBtu/hr. Pursuant to this NSPS, the owner/operator of this facility must comply with the reporting and recordkeeping as indicated under 40 CFR Part 60.48c. There are no other applicable requirements under this section since the boiler can only fire natural gas.
- (b) The boiler rated at 8.4 MMBtu/hr is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc), because of the boiler has maximum heat input capacity less than the applicable maximum heat input capacity of 10 MMBtu/hr.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Potential Significant Deterioration)

This source is not a major source because volatile organic compounds is limited at 20.75 tons per month, which is equivalent to 249 tons per year. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.2, the PSD requirements do not apply.

326 2-3-1 (Emission Offset)

LaPorte County is currently an attainment area for sulfur dioxide. However, prior to January 1997, LaPorte County was designated as nonattainment for sulfur dioxide. This source was not major for Emission Offset even at that time because the potential emissions of sulfur dioxide were less than 100 tons per year. Therefore, the Emission Offset rules, 326 IAC 2-3 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- a) The (10.5 rating MMBtu/hr) natural gas fired boiler (installed in April 1996) is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited to 0.6 pounds per MMBtu heat input.

Rule applicability 326 IAC 6-2-4 formula is $1.09/Q^{0.26}$.

Where:

Q = Total source maximum operating capacity rating MMBtu per hr heat input (10.5 MMBtu/hr).

$$PM = 1.09/10.5^{0.26} =$$

$$PM = 1.09/1.8 = 0.6 \text{ lb/MMBtu}$$

Allowable PM

(326 IAC 6-2-4)

6.3 lbs/hr

vs

Potential PM

>

0.09 lbs/hr

this meets the 326 IAC 6-2-4 rule

- b) The (8.4 rating MMBtu/hr) natural gas fired boiler (installed in first quarter of 1997) is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited to 0.5 pounds per MMBtu heat input.

Rule applicability 326 IAC 6-2-4 formula $1.09/Q^{0.26}$

Where:

Q = Total source maximum operating capacity rating MMBtu per hr heat input. Thus, the total MMBtu per heat input is 18.9 MMBtu/hr. (10.5 MMBtu/hr + 8.4MMBtu/hr = 18.9 MMBtu/hr)

$$PM = 1.09/18.9^{0.26} =$$

$$PM = 1.09/2.1 = 0.5 \text{ lb/MMBtu}$$

| | | | |
|---|---------|-----------------------------|-----------------------------------|
| Allowable PM (326 IAC 6-2-4) 4.2 lbs/hr | vs > | Potential PM 0.09 lbs/hr | this meets the 326 IAC 6-2-4 rule |
|---|---------|-----------------------------|-----------------------------------|

326 8-1-6 (New Facilities, General Reduction Requirements)

The process of packing by using molding compound is subject to 326 IAC 8-1-6 (New Facilities General Reduction Requirements), because it has the potential to emit 249 tons/yr of VOC which is more than 25 tons/yr. Pursuant to the rule requirements, the applicant has submitted a Best Available Control Technology (BACT) analysis.

To satisfy the BACT requirement, the applicant shall :

- a) continuously search for material with lower pentane and VOC content.
- b) submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this polystyrene shape molding source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T091-7666-00079**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name: Polyfoam Packers Corporation
Source Location: 955 Woodland Avenue, Michigan City, IN 46360
County: LaPorte
SIC Code: 3086
Operation Permit No.: T091-7666-00079
Permit Reviewer: Peggy Zukas

On January 2, 1998, the Office of Air Management (OAM) had a notice published in the News Dispatch, Michigan City, Indiana, stating that Polyfoam Packers Corporation had applied for a Part 70 Operating Permit to operate a stationary polystyrene shape molding. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 26, 1998, Polyfoam Packers Corporation submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Polyfoam's goal is to be able to move equipment in and out of the plant without being required to revise Section A.2 of the permit as long as it operates within the permit's emissions cap. The draft permit does not expressly provide for this. We ask that the section on operational flexibility (pages 15-17 for the draft) be revised to expressly allow for the movement of equipment in and out of the plant.

Response to Comment 1:

The purpose of Section A.2 is to list all the facilities that have been permitted at the source. It is not necessary for OAM to give prior approval for permitted equipment to be moved in or out of a plant as long as the conditions are met in B.24 (Operational Flexibility and other applicable conditions). The condition shall remain the same.

Comment 2:

In section A.2 of the draft permit there is a reference in Item 2 to twelve silos. The plant currently has 24 silos.

Response to Comment 2:

Section A.2 (2) and Section D.2 the facility description has been amended as follows:

- a. ~~Twelve (12)~~ **Twenty-four (24)** foam polystyrene storage silos with a total maximum storage capacity of 60,000 pounds.

Comment 3:

Section C.10, second sentence states the Permittee shall be responsible for installing necessary compliance monitoring equipment. However, no such equipment is necessary and that sentence should be deleted.

Response to comment 3:

This condition applies to compliance with all applicable requirements stated in the permit and not just condition D.1 for example, conditions C.8(Performance Testing [326 IAC 3-6]), Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6] and etc.

Comment 4:

Section D.2.1 mistakenly states that “the input VOC from the usage of expandable polystyrene in the shape molding process shall be limited to 20.75 tons per month”. The emissions (i.e., output) are limited to 20.75 tons per month not the input. Some of the pentane is retained in the molded product and for that reason the input is greater than output. The word “input” should be changed to -output.

Response to comment 4:

Section D.2.1 the condition shall be amended as follows:

Using the VOC limit and the amount of pentane known to be emitted , the allowable input VOC was calculated. The equation used was $(\text{input})(\% \text{emitted}) = 20.75 \text{ tons/month}$. Therefore, the input limit was determine to be 26.77 tons per month at 77.5% being emitted. The condition has been amended as:

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

~~Pursuant to CP 091-4823-00079, issued on March 29, 1996, the input VOC from the usage of expandable polystyrene in the shape molding process shall be limited to 20.75 tons per month. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.~~ **the molding process shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.**

Comment 5:

Page 29, Section D.2.2 states that BACT is the use of the “lowest available” pentane content material. Polyfoam uses the lowest available pentane content material that is both feasible for the particular application and for the time lapse between expansion and molding. We believe that this complies with the permit requirements. However, if there is any question, then Polyfoam requests that the permit include the language “feasible for the particular application and scheduling of the molding process”.

Response to comment 5:

OAM had determined that the BACT condition shall remain the same because the BACT does not specifically state that the Polyfoam Products shall change their application method in order to use the lowest pentane content material. The BACT requires the company to do the following:

1. continuously search for material with lower pentane and VOC content, and
2. submit an annual report within 30 days of January 1,
 - a. describing the search conducted during the past twelve (12) months,
 - b. results of the previous year’s search, and

- c. schedule of switching to material with lower pentane and VOC content if the material is available.

Comment 6:

On page 30, the reference in Section D.2.4(a)(1) to “polystyrene” should be -expandable polystyrene molding compound-.

Response to comment 6:

Section D.2.5(a)(1) shall be amended as follows:

- (1) The amount and VOC content of ~~polystyrene~~ **expandable polystyrene molding compound**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

Comment 7:

Please explain to us the purpose of the calculation of potential VOC emissions in Appendix A, Calculations for Potentials Emissions, page 2 of 6.

Response to Comment 7:

In order to determine compliance with 326 IAC 6-2-4 rule and emissions limitations, OAM needed to perform boiler calculations. The second set of calculations were performed to determine the VOC emissions during expanding, storing, and molding of the molding compound.

Comment 8:

The notice of 30 day period for public comment and page 3 of the technical support document refers to an enforcement issue relating to the installation of additional equipment after the initial installation of equipment. This was part of the original plan for the facility and was discussed from the beginning with the agency. The equipment is of the same type as the originally installed and no additional regulatory requirements apply. The plant has and will continue to operate within the 20.75 tons per month VOC emissions limit. Polyfoam does not believe that there has been a modification of the facility and would like to discuss IDEM's position on this matter.

Response to comment 8:

The Office of Air Management and the Office of Enforcement will continue to discuss this matter with Polyfoam Packers. The company should know that the Title V rule's provisions did not allow for the addition of more equipment because:

- a) Polyfoam Packers had not received an approved Title V Operating Permit (TVOP), and
- b) The Construction permit rules 326 IAC 2-1 contain separate requirements regarding the installation of new equipment that were not superseded by the TVOP rules.

Comment 9

On February 25, 1998, OAM received a one (1) page annual report dated April 20, 1995 submitted by Charles M. Chadd, lawyer for Polyfoam Packers, concerning new limits based on a total source wide cap.

Per conversation with Charles M. Chadd, attorney for Polyfoam Packers Corporation, the company believes that the Clean Air Act rule of 502 (b) (10) allows a company to install new equipment without permit approval.

Response to comment 9:

The Office of Air Management and the Office of Enforcement will continue to discuss this matter with Polyfoam Packers. The company should know that the Title V rule's provisions did not allow for the addition of more equipment because:

- a) Polyfoam Packers had not received an approved Title V Operating Permit (TVOP), and
- b) The Construction permit rules 326 IAC 2-1 contain separate requirements regarding the installation of new equipment that were not superseded by the TVOP rules.

Upon further review, the OAM has decided to make the following revisions to the permit (bold language has been added, the language with a line through it has been deleted). The table of contents has been modified to reflect these changes.

Section A

- 1) A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

- 2) A.1 (General Information) the way to describe a nonattainment area within an attainment county has been changed as follows.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

County Status: Nonattainment **for sulfur dioxide**

- 3) Condition A.4 paragraph (b) was added to the permit.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
 - (b) **It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**
- 4) A.5 (Prior Permit Conditions Superseded) condition has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

Section B

- 1) B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

- 2) B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

- 3) B.11 (Annual Compliance Certification) part (c) of the condition has been changed to the following:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**

**(5) Any insignificant activity that has been added without a permit revision;
and**

- ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

4) B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

5) B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

-
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ **(b) The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following~~:
- (1) The applicable requirements are included and specifically identified in this permit;
or

- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**
- ~~(b) (c)~~ **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- ~~(e) (d)~~ **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**
- ~~(d) (e)~~ **Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:**
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e) (f)~~ **This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).**
- ~~(f) (g)~~ **This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]**
- ~~(g) (h)~~ **This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]**
- 6) B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
within ten (10) calendar days from the date of the discovery of the deviation.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(c)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

- 7) B.18 (Permit Renewal) part (a) of the condition has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

- 8) B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification) shown below. The new B.19 condition will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

- 9) B.26 (now B.24) (Inspection and Entry) removed “IDEM”.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

- 10) B.27 (now B.25) (Transfer of Ownership or Operation) part (b) of the condition has been changed as follows:

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- 11) B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

- 12) B.27 (Enhanced New Source Review [326 IAC 2] has been deleted.

~~**B.27 Enhanced New Source Review [326 IAC 2]**~~

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

- 12) B.28 (Credible Evidence) is a new condition that has been added to the end of section B, it will read as follows:

~~**B.28 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]**~~

~~Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.~~

Section C

- 1) C.1 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour): this is a new condition.

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

- 2) Under C.2 (Opacity) the statement, "This condition is not federally enforceable.", has been deleted.

- 3) C.3 (Open Burning) has been has been changed:

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**

- 4) Under C.4 (Incineration), the statement: "This condition is not federally enforceable.", has been removed.

- 5) C.5 (Fugitive Dust Emissions) has been changed:

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). **326 IAC 6-4-2(4) is not federally enforceable.**

- 6) C.6 (Operation of Equipment) has been changed as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

- 7) C.7 (Asbestos Abatement Projects- Accreditation) and C.12 (Asbestos Abatement Projects) have been combined into one condition which will read as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**

(b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

- (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**

- (2) **If there is a change in the following:**

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
- 8) C.8 (Performance Testing) the rule cite has been changed to 326 IAC 3-6 and add the following language:

C.8 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 9) C.9 (Compliance Schedule) has been changed as follows:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

- 10) C.10 (Compliance Monitoring) has been changed as follows:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than **ninety (90) days** after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 11) C.11 (Monitoring Methods) has been changed as follows:

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

- 12) C.12 (Asbestos Abatement Projects) delete this condition. It is now C.8 (Asbestos Abatement Projects) and has been revised there.

~~C.16 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

- ~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~
- ~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~
- ~~(1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~
- ~~(2) If there is a change in the following:~~
- ~~(A) Asbestos removal or demolition start date;~~
- ~~(B) Removal or demolition contractor; or~~
- ~~(3) Waste disposal site.~~
- ~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~
- ~~All required notifications shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~(e) Procedures for Asbestos Emission Control~~
- ~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) Indiana Accredited Asbestos Inspector~~
- ~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

- 13) C.12 (Emergency Reduction Plans) has been changed as follows:

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

- 14) C.13 (Risk Management Plan) has been changed as follows:

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- 15) C.14 (Actions Related to Noncompliance Demonstrated by a Stack Test), add the following rule cites to the title, and add language as follows:

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- 16) C.15 (Emission Statement) part (a) of the condition has been changed as follows:

C.15 Emission Statement ~~[326 IAC 2-7-5(3)(C)(iii)]~~~~[326 IAC 2-7-5(7)]~~~~[326 IAC 2-7-19(c)]~~~~[326 IAC 2-6]~~

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- 17) C.17 (General Record Keeping Requirements) has been changed as follows:

C.17 General Record Keeping Requirements ~~[326 IAC 2-7-5(3)(B)]~~**[326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative, ~~for a minimum of three (3) years~~. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request~~. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

- 18) C.18 (General Reporting Requirements) change "Quality" to "Quarterly", and change the language as follows: C.18 (General Reporting Requirements) part (a) and (b) has been changed:

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) ~~Reports required by conditions in Section D of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

- (b) **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- ~~(b)~~ (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- ~~(c)~~ (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- ~~(d)~~ (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

- ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation;~~

- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter;~~

- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation;~~

- (e) (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Section D

- 1) D (Facility Operation Conditions) add the following language to the facility description box in all D sections.

SECTION D.1 FACILITY OPERATION CONDITIONS

| |
|---|
| Facility Description [326 IAC 2-7-5(15)] |
|---|

- 2) D.1.2, and D.3.2, (Testing Requirements) has been changed as follows.

~~D.1.2 and D.3.2~~ Testing Requirements [326 IAC 2-7-6(1), (6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 or D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

- 3) Condition D.1.5 has been deleted because the boiler is burning natural gas only. The natural gas fired boiler certification form has also been deleted.

~~D.1.5 Reporting Requirements~~

~~The natural gas boiler certification form will document compliance with condition D.1.1 when the boiler is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.~~

Forms

- 1) The Certification Form is revised to clarify which forms require a certification.
- 2) The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.
- 3) The Emergency/ Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.

BACT Analysis

An NOD was mailed to Polyfoam Packers on December 17, 1998. Polyfoam Packers was operating two pre expanders, one rated at 500 pounds per hour and the other rated at 1,500 pounds per hour without prior approval from OAM. Because of this, the company had to submit a BACT analysis for the unpermitted equipment. The OAM permit engineer that reviewed the BACT analysis was Trip Sinha. The following information is the BACT determination:

The USEPA clearing house and permits issued in Indiana were reviewed for the polystyrene foam extrusion plants. The BACT determinations are listed in the following table.

| Name | BACT |
|--|---|
| Genpak, Cedar City, Utah | No controls or material substitution |
| Formpac Division of Cryovac, Reading, Pennsylvania | Substitution of carbon dioxide for 15% of the pentane blowing agent |
| Formpac, Indianapolis, Indiana | Controls on reclaim extruders |

Substituting carbon dioxide for 15% of the pentane as utilized in the Formpac Division of Cryovac is not appropriate for the manufacturing process utilized by Polyfoam Packers.

The Polyfoam Packers does not utilize reclaim extruders in its process.

Therefore, these technologies were rejected for Polyfoam Packers.

Polyfoam Packers Corporation submitted an analysis of BACT for VOC emissions from the pre expander for the foam manufacturing process.

At a plant wide limit of 249 tons per year, emissions from the two pre expanders would total 77.1 tons per year.

The control technology analysis evaluated recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, regenerative catalytic incineration, carbon adsorption, absorption, condensation, and carbon adsorption/ oxidation.

Absorption is not a feasible VOC control technology for the Polyfoam Packers' processes, because pentane is not soluble in water. Condensation is not a feasible technology for the Polyfoam Packers' processes, because temperatures low enough to condense the very dilute vapors can not be obtained with commercial refrigeration systems.

Recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, regenerative catalytic incineration, carbon adsorption, absorption, condensation, and carbon adsorption/ oxidation are all feasible technologies. The cost effectiveness for these add on control technologies range from \$7,200/ton of VOC for carbon adsorption/oxidation or regenerative thermal incineration to over \$10,000 for recuperative catalytic incineration.

Using the maximum current VOC emission rate of 32.7 tons per year possible from the pre expanders, the lowest cost of control increases to nearly \$15,000 per ton of VOC controlled.

The OAM, IDEM, believes the cost effectiveness to control the VOC from the pre expanders to be excessive.

BACT - The OAM, IDEM has determined the BACT for the pre expanders to be as follows:

1. The molding compound shall contain a maximum average of 5.5% pentane.
2. Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.
3. The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

Section D.2 has been modified as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

BACT - The OAM, IDEM has determined the BACT for the pre expander, rated at 500 pounds per hour and # 2 pre expander, rated at 1500 pounds per hour shall be as follows:

- 1. The molding compound shall contain a maximum average of 5.5% pentane.**
- 2. Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.**
- 3. The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.**

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 and ~~D.2.2~~ shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
 - (1) The amount and VOC content of expandable polystyrene molding compound. Records shall include purchase orders, invoices, and material safety data

sheets (MSDS) necessary to verify the type and amount used;

- (2) A log of the dates of use;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
 - (c) To document compliance with Condition D.2.3 , the Permittee shall maintain records of the average monthly pentane content which shall be less than 5.5%.

D.2.6 Reporting Requirements

- a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- b) To document compliance with Condition D.2.2 **and D.2.3** the Permittee shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous years search, and schedule of switching material with lower pentane and VOC content if the material is available.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Polyfoam Packers Corporation
Source Address: 955 Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-7666-00079

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Polyfoam Packers Corporation
Source Address: 955 Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-7666-00079

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

| <u>Compliance Monitoring Requirement</u> (e.g. Permit Condition D.1.3) | Number of Deviations | Date of each Deviations |
|--|---------------------------------|--------------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.